

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEB 9 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
FWCC Request for Declaratory Ruling on)
Partial-Band Licensing of Earth Stations in the)
Fixed-Satellite Service That Share Terrestrial)
Spectrum)
)
FWCC Petition for Rule Making to Set Loading)
Standards For Earth Stations In the Fixed-)
Satellite Service that Share Terrestrial Spectrum)

IB Docket No. 00-203
RM-9649

REPLY COMMENTS

Sprint Communications Company L.P. ("Sprint") hereby respectfully submits its Reply Comments on the Commission's *Notice of Proposed Rulemaking* ("Notice"), FCC 00-369, released October 24, 2000 in the above-captioned proceeding.

In its Comments, the Fixed Wireless Communications Coalition (FWCC) suggests alternative procedures to those proposed by the Commission (p. 3):

- An earth station may be initially licensed for twice its amount of "projected need" --again, broadly construed to accommodate individual earth stations that access multiple or varying satellites, or otherwise have unpredictable needs. In occasional situations, licensing at twice projected need may cover the entire band in the vicinity of that particular earth station.
- After 24 months, an earth stations using less than half of the licensed bandwidth must modify its license to reduce the bandwidth to twice its actual need.

Sprint opposes FWCC's alternative procedures for earth stations used to provision international telecommunications services in the 3700-4200 MHz and 5925-6425 MHz bands. Indeed, FWCC's proposal here is, in effect, nothing more than a reformulation of

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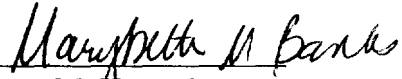
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its previous proposal which the Commission rejected. As Sprint emphasized in its Comments, full-band licensing is essential for international earth stations for which the satellite frequency is assigned by the international space segment provider at its discretion. FSS international earth station licensees must have the ability to move to any frequency assigned to it in the full 3700-4200 MHz and 5925-6425 MHz bands before and after the initial 24 month period. Such new assignments can happen at any time as a result of a satellite equipment failure, new circuits being coordinated in accordance with satellite coordination agreements, new satellites being launched to replace older ones, reconfiguration of existing satellites, re-pointing of antennas to satellites in new orbital locations, etc. Clearly, the requirement for new frequencies for these reasons is not predictable based on prior spectrum use. Because current usage of satellites and transponders cannot be relied upon to predict future usage, international earth stations used for international telecommunications services must retain full band licenses.

Any limitation on the flexibility to change to any frequency within the full 3700-4200 MHz and 5925-6425 MHz bands for international earth stations would be highly impractical and severely detrimental to Sprint's international telecommunications services. Sprint has no alternative to satellite service to serve many international countries. In order to maintain the high quality telecommunications services required by our international customers, Sprint must have the flexibility to move to different frequencies within the full 3700-4200 MHz and 5925-6425 MHz bands at all times.

For these reasons, as well as those set forth in our initial comments, Sprint urges the Commission to reject FWCC's latest proposal.

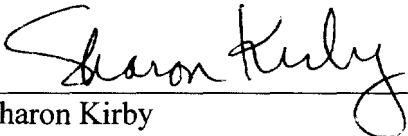
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February 9, 2001

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Reply Comments of Sprint Corporation in CC Docket No. 00-203 was sent by United States first-class mail, postage prepaid, or Hand Delivery, on this 9th day of February, 2001 to the parties listed below.


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